

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA
FOURTH DIVISION

AALFA Family Clinic, et al.

Plaintiffs,

v.

Tim Walz, et al.,

Defendants.

Case No. 0:20-cv-01037-PJS-DTS

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

The plaintiffs respectfully move for a preliminary injunction that will enjoin the state's officials from enforcing Executive Orders 20-09, 20-20, 20-30, 20-48, and any current or future executive order that restricts elective surgeries, regulates the use or consumption of personal protective equipment (PPE), restricts church attendance, or imposes social-distancing requirements of any sort, unless and until those orders are amended or clarified to prohibit surgical abortions except for patients who are contraindicated for medication abortion, or for patients who were unable to schedule and obtain a medication abortion during the time in which medication abortion is legally available in Minnesota.

The plaintiffs also seek a preliminary injunction will enjoin the defendant abortion clinics from performing surgical abortions except on patients who are contraindicated

for medication abortion, or on patients who were unable to schedule and obtain medication abortion during the time in which medication abortion is legally available in Minnesota.

The accompanying brief provides our arguments and authorities.

Respectfully submitted.

THOMAS BREJCHA*
Illinois Bar No. 0288446
MARTIN WHITTAKER*
Illinois Bar No. 6208211
Thomas More Society
309 West Washington Street, Suite 1250
Chicago, Illinois 60606
(312) 782-1680 (phone)
(312) 782-1887 (fax)
info@thomasmoresociety.org

* *pro hac vice* applications
forthcoming

Dated: May 3, 2020

/s/ Erick G. Kaardal
ERICK G. KAARDAL
Minnesota Bar No. 0229647
Mohrman, Kaardal & Erickson, P.A.
150 South Fifth Street, Suite 3100
Minneapolis, Minnesota 55402
(612) 341-1074 (phone)
(612) 341-1076 (fax)
kaardal@mklaw.com

JONATHAN F. MITCHELL*
Texas Bar No. 24075463
Mitchell Law PLLC
111 Congress Avenue, Suite 400
Austin, Texas 78701
(512) 686-3940 (phone)
(512) 686-3941 (fax)
jonathan@mitchell.law

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I certify that I will hire a process server to deliver serve this document and all supporting exhibits, along with the complaint and summons, upon each of the defendants on Monday, May 4, 2020.

/s/ Erick G. Kaardal
ERICK G. KAARDAL
Counsel for Plaintiffs